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Attorneys for Howard M. Ehrenberg,  
Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re:  
SPECTRUM LINK, INC.,  
Debtor.

HOWARD M. EHRENBERG, Chapter 7  
Trustee,

Plaintiff,

vs.

MILLENNIUM MARKETING  
CONCEPTS, INC., UNITED CARE  
RESIDENTIAL, INC., and ALEX  
MUKATHE,

Defendants.

Case No. 2:21-bk-16403-VZ

Chapter 7

Adversary No.: 2:23-ap-01173-VZ

**STIPULATION TO DISMISS  
ADVERSARY PROCEEDING WITH  
PREJUDICE**

Status Conference Date:

Date: January 30, 2025

Time: 10:30 a.m.

Place: Courtroom 1368  
Roybal Federal Building  
255 East Temple Street  
Los Angeles, CA 90012

**I.**

**PARTIES**

This Stipulation ("Stipulation") is entered into by and between Plaintiff Howard M. Ehrenberg, chapter 7 trustee ("Plaintiff"), on the one hand, and Alex Mukathe ("Mukathe") on the other hand. Plaintiff and Mukathe are collectively referred to as the "Parties".

**GREENSPOON MARDER LLP**  
333 SOUTH GRAND AVENUE, SUITE 3400  
LOS ANGELES, CALIFORNIA 90071  
TEL 213.626.2311 • FAX 213.629.4520

II.

**RECITALS**

1. On June 9, 2023, Plaintiff filed a complaint ("Complaint") the above-captioned defendants, including Mukathe, seeking to avoid and recover certain alleged fraudulent transfers, which initiated the above-captioned adversary proceeding ("Adversary Proceeding") (Docket No. 1).

2. On January 9, 2024, Plaintiff filed motion for default judgment, which was granted on February 22, 2024 (Docket No. 23). Thereafter, this adversary proceeding closed.

3. Thereafter, Mukathe filed a motion to reopen the Adversary Proceeding and set aside Plaintiff's default judgment against him.

4. The Court has set aside Plaintiff's default judgment against Mukathe.

5. The Parties communicated extensively regarding Plaintiff's claims and Mukathe's defenses to the Plaintiff's claims, and as a result of these discussions, the Parties now desire to dismiss this adversary proceeding with prejudice.

**STIPULATION**

The Parties agree and stipulate as follows:

1. This Adversary Proceeding shall be dismissed with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

2. The Status Conference and all pending hearings in this Adversary Proceeding shall be vacated and taken off calendar.

**IT IS SO STIPULATED.**

1 DATED: January 14, 2025

**GREENSPOON MARDER LLP**

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3  
4 By: 

5 Steven F. Werth

6 Attorneys for Plaintiff

7 Howard M. Ehrenberg, Chapter 7 Trustee

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9  
10 DATED: January 14, 2025

**ANYIAM LAW FIRM**

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13 By: 

14 Christian U. Anyiam, Esq.

15 Attorney for Mr. Alex Mukathe

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1875 Century Park East, Suite 1900, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO DISMISS ADVERSARY PROCEEDING WITH PREJUDICE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) January 16, 2025 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Christian U Anyiam** anyiamlawfirm@gmail.com, chrisanyiam4law@gmail.com;anyiamcr85946@notify.bestcase.com
- **Howard M Ehrenberg (TR)** ehrenbergtrustee@gmlaw.com, ca25@ecfcbis.com;C123@ecfcbis.com;howard.ehrenberg@ecf.courtdrive.com;Karen.Files@gmlaw.com
- **Mark S Horoupian** mark.horoupian@gmlaw.com, mhoroupian@ecf.courtdrive.com;cheryl.caldwell@gmlaw.com;karen.files@gmlaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Steven Werth** steven.werth@gmlaw.com, swerth@ecf.courtdrive.com; pdillamar@ecf.courtdrive.com,Karen.Files@gmlaw.com;patricia.dillamar@gmlaw.com

☐ Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) January 16, 2025 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Millennium Marketing Concepts Inc., a California corporation  
(Suspended Corporation - Inactive: 4/26/18)  
Agent for Service of Process: Alex Mukathe,  
8221 3rd St., Ste. 204,  
Downey, CA 90241

United Care Residential, Inc., a California corporation  
(Suspended Corporation 5/29/2019)  
Agent for Service of Process: Alex Mukathe,  
8221 3rd Street, Suite 204,  
Downey, CA 90241

☐ Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 16, 2025

*Date*

Patricia Dillamar

*Printed Name*

*/s/Patricia Dillamar*

*Signature*